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UNITED STATES DISTRICT COURT

DISTRICT OF OREGON

EUGENE DIVISION

WYATT B. and NOAH F. by their next friend Michelle McAllister; KYLIE R. and ALEC R. by their next friend Kathleen Megill Strek; UNIQUE L. by her next friend Annette Smith; SIMON S. by his next friend Paul Aubry; RUTH T. by her next friend Michelle Bartov; BERNARD C. by his next friend Ksen Murry; NAOMI B. by her next friend Kathleen Megill Strek; and NORMAN N. by his next friend Tracy Gregg, individually and on behalf of all others similarly situated,

Plaintiffs,

v.

TINA KOTEK, Governor of Oregon in her official capacity; FARIBORZ PAKSERESHT, Director, Oregon Department of Human Services in his official capacity; APRILLE FLINT-GERNER, Director, Child Welfare in her official capacity; and OREGON DEPARTMENT OF HUMAN SERVICES,

Defendants.

Case No. 6:19-cv-00556-AA

**DEFENDANTS' SUPPLEMENTAL
TRIAL EXHIBIT LIST**

Defendants submit the following supplemental trial exhibits. In addition, defendants reserve the right to introduce for impeachment additional exhibits not referenced below and reserve Exhibit Nos. 1253-1400 for such purpose.

No.	Description	Stip.	Obj.	Id.	Adm.
1240	Public Knowledge Raw Survey Data – contains confidential information				
1241	Public Knowledge Assessment Methodology and Protocols for Oregon Child Welfare Review (Sep. 17, 2021)				
1242	Continuum of Care Beyond Foster Care (Dec. 2018)				
1243	Oregon DHS Office of Child Welfare Programs, Action Request Transmittal, Documenting Disability and Reasonable Modification Information (Nov. 1, 2021)				
1244	Oregon DHS Child Welfare Division, Fact Sheet, Updates to Screening Practice related to ORCAH and OTIS (10/1/20)				
1245	Oregon Screening Report, Assessment, and Foster Care Data re Reports of Abuse and Children Entering Foster Care – April 2019 to March 2024				
1246	Third Party and OTIS Guide Table of Contents				
1247	U.S. Dept. of Health and Human Services, U.S. Dept. of Justice, Protecting the Rights of Parents and Prospective Parents with Disabilities: Technical Assistance for State and Local Child Welfare Agencies and Courts under Title II of the Americans with Disabilities Act and Section 504 of the Rehabilitation Act, retrieved from https://www.hhs.gov/sites/default/files/disability.pdf .				
1248	Voluntary Resolution Agreement between U.S. Dept. of Health and Human Services Office for Civil Rights and Oregon Dept. of Human Services (Nov. 2019)				
1249	KEEP Young Adult Qualitative Interviews				

No.	Description	Stip.	Obj.	Id.	Adm.
1250	Oregon DHS Office of Developmental Disability Services, Request for Eligibility Determination (11/2015)				
1251	Health Care Profile re A.R. – contains confidential/AEO information				
1252	Health Care Profile re B.P.Z. – contains confidential/AEO information				
1253	Health Care Profile re V.C. – contains confidential/AEO information				
1254	Health Care Profile re G.J. – contains confidential/AEO information				
1255	Health Care Profile re K.H. – contains confidential/AEO information				
1256	Medical Evaluation re K.H. – contains confidential/AEO information				
1257	Personal Care Services History re K.H. – contains confidential/AEO information				
1258	Placement History re K.H. – contains confidential/AEO information				
1259	Health Care Profile re L.C. – contains confidential/AEO information				
1260	Placement History re L.C. – contains confidential/AEO information				
1261	Health Care Profile re T.O. – contains confidential/AEO information				
1262	Health Care Profile re I.M. – contains confidential/AEO information				

DATED: April 29, 2024

ELLEN ROSENBLUM
ATTORNEY GENERAL
FOR THE STATE OF OREGON

/s/ Adele J. Ridenour

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